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May 16, 2025

VIA ECF

Honorable Brian R. Martinotti, U.S.D.J.
United States District Court
District of New Jersey
U.S. Post Office & Courthouse
2 Federal Square
Newark, NJ 07102

Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS
MDL No. 3080 | Bi-weekly status report

Dear Judge Martinotti:

Pursuant to CMO #5, the parties provide the following status update for the weeks ending May 9 and May 16. We have also attached a current list of pending motions.

1. The parties filed supplemental briefing on the issue of constructive notice. *See* ECF Nos. 533–38, 563–66, 568–69.
2. The parties filed letter briefs addressing the remaining disputes regarding a Privilege Log Protocol. *See* ECF Nos. 549–51, 567, 570.
3. On May 7, 2025, Defendants served their opening brief regarding global deficiencies in SFP Plaintiff Fact Sheet responses and productions. Plaintiffs are preparing their response, which the parties anticipate raising with the Court via joint submission on May 23, 2025.
4. On May 8, 2025, Plaintiff Puerto Rico requested leave to file a Motion for Leave to Amend Complaint. *See* ECF No 554. On May 15, 2025, the PBM Defendants filed an opposition to Puerto Rico’s request, *see* ECF No 560; the Manufacturer Defendants joined in opposing the request, *see* ECF No 561.
5. Defendants conferred with certain Plaintiffs in the AG Track regarding deficiencies in Plaintiff Fact Sheet responses and productions.

Thank you for your continuing attention to this matter.

Respectfully submitted,

/s Matthew F. Gately
Matthew F. Gately
Liaison Counsel for
Class Action Track

/s Joanne Cicala
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Liaison Counsel for
State Attorneys General Track

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/s/ David R. Buchanan
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Liaison Counsel for
Self-Funded Payer Track

/s/ John D. Tortorella
John D. Tortorella

Enclosures

cc: Honorable Rukhsanah L. Singh, U.S.M.J.
All counsel of record